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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION

SCOT CARLEY, on behalf of
himself and all others
similarly situated,

Plaintiffs,

VS.

CREST PUMPING
TECHNOLOGIES, L.L.C.,

Defendant.

X
X
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X
X
X
X
X
X

CIVIL ACTION

NO.: 7:15-CV-66161-HLH

ORAL DEPOSITION OF

DAVID WAYNE CROMBIE

CORPORATE REPRESENTATIVE OF

CREST PUMPING TECHNOLOGIES, LLC

March 29, 2016

ORAL DEPOSITION OF DAVID WAYNE CROMBIE, produced as

a witness at the instance of the Plaintiffs, and duly
sworn, was taken in the above-styled and numbered cause
on March 29, 2016, from 9:02 a.m. to 12:28 p.m., before
JENNIFER L. SANDERS, CSR in and for the State of Texas,
reported by machine shorthand, at the offices of Murphy
Mahon Keffler & Farrier, 505 Pecan Street, Suite 201,
Fort Worth, Texas pursuant to the Federal Rules of Civil
Procedure and the provisions stated on the record and/or
attached hereto.

ORIGINAL

Julia Whaley & Associates
214-668-5578

EXHIBIT

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ALSO PRESENT:

Ms. Heather Schmidt
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I N D E X

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10:12:39 1 Q. Why -- why does a service supervisor need a
10:12:39 2 company truck?

10:12:39 3 A. Because they lead the crew on the job and
10:12:39 4 supervise the crew.

10:12:39 5 Q. Are the -- let's talk about the job duties of
10:12:39 6 Mr. Brown and Mr. Carley as it relates to why they needed
10:12:39 7 a company vehicle. What -- what were their
10:12:39 8 responsibilities in working for Crest as a cement service
10:12:39 9 supervisor?

10:12:39 10 A. They -- they supervise the crews on location.

10:12:39 11 Q. You say location. What's the location?

10:12:40 12 A. Job site.

10:12:40 13 Q. And that's a drilling well, or what is it?

10:12:40 14 A. It could be, yes.

10:12:40 15 Q. What else could it be?

10:12:40 16 A. It could be remedial work.

10:12:40 17 Q. And where would the remedial work take place?

10:12:40 18 A. On the location of the well.

10:12:40 19 Q. So it's going to be the -- where a well is
10:12:40 20 located; is that fair to say?

10:12:40 21 A. Yes.

10:12:40 22 Q. And how -- how far are these different wells
10:12:40 23 they go to? How far are they from where they're coming
10:12:40 24 from, I guess their houses?

10:12:40 25 A. I don't know where they live.

10:12:41 1 Q. And were Mr. Brown and Mr. Carley's primary
10:12:41 2 responsibilities or duties, did they involve just
10:12:41 3 cementing jobs or what were their -- what were their
10:12:41 4 responsibilities in their role with Crest?

10:12:41 5 A. At that time it would have been cementing jobs,
10:12:41 6 I believe, only.

10:12:42 7 Q. So they were responsible for going to the job
10:12:42 8 site, and how does one do cementing work for us pencil
10:12:42 9 pushers that don't know?

10:12:42 10 A. What is his responsibility, is that what you're
10:12:42 11 asking?

10:12:42 12 Q. Yeah, Mr. Brown and Mr. Carley's.

10:12:42 13 A. They supervise the job. So they make sure all
10:12:42 14 the equipment operators, oversee those guys, just make
10:12:42 15 sure they're doing what they're supposed to.

10:12:42 16 Q. Do they operate equipment, as well?

10:12:42 17 A. The cementing head usually is all they operate.

10:12:42 18 Q. Now, what does operating a cementing head --
10:12:42 19 what is that? What does that mean as far as the process?

10:12:42 20 A. Well, along with a rig crew, they put it on,
10:12:42 21 just kind of guide it on the casing. And then at the
10:12:42 22 time they drop the plug that's in the -- that's in the
10:12:42 23 side of the cementing head after the cement is pumped.
10:12:42 24 So it involves pulling a -- turning a pin out of the head
10:12:42 25 with their hand.

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REPORTER'S CERTIFICATION

DEPOSITION OF DAVID WAYNE CROMBIE

March 29, 2016

I, Jennifer L. Sanders, Certified Shorthand Reporter in and for the State of Texas, hereby certify to the following:

That the witness, DAVID WAYNE CROMBIE, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness;

That the deposition transcript was submitted on
4/22, 2016 to Ms. Jennifer L. Anderson,
attorney for DAVID WAYNE CROMBIE, for examination,

1 signature and return to me by 5-23, 2016.

2 That the amount of time used by each party at
3 the deposition is as follows:

4 MR. COLLIN J. WYNNE: 2 Hour(s), 48 Minute(s)
5 MS. JENNIFER L. ANDERSON: 6 Minute(s)

6 That pursuant to information given to the
7 Deposition officer at the time said testimony was taken,
8 the following includes counsel for all parties of record:

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21 That \$_____ is the deposition officer's
22 charges to the Plaintiffs for preparing the original
23 deposition transcript and any copies of exhibits;

24 I further certify that I am neither counsel
25 for, related to, nor employed by any of the parties or

1 attorneys in the action in which this proceeding was
2 taken, and further that I am not financially or otherwise
3 interested in the outcome of the action.

4 . Certified to by me this 22nd day of
5 April, 2016.
6

7
8 
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